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Local Plan Review Consultation  
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Mid Devon District Council  
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Dear Sir/Madam,

### **LOCAL PLAN REVIEW – OPTIONS CONSULTATION**

We write on behalf of our client, Price Waterhouse Cooper, who have interests in Mid Devon district, Cullompton in particular. We enclose representations on our client's behalf in response to Mid Devon District Council's *Local Plan Review – Options Consultation* (January 2014).

### **Amount and Distribution of Development – Policy S3**

Policy S3 proposes the provision of 8,400 dwellings and 154,000 square metres of commercial floor space between 1st April 2013 and 31st March 2033.

Policy S3 identifies two possible options for delivering the quantum of development suggested:

- Option 1 – Town Focus (i.e. Cullompton, Tiverton and Crediton)
- Option 2 – A New Community

Mid Devon is largely rural in character, and because of this, we believe that development should be focussed at the main towns within the district. Therefore, we strongly support Option 1. The main towns provide the greatest level of services and facilities and the greatest opportunity for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and employment are shorter, which reduces reliance on the car and allows those without a car access to services and employment.

Option 1 strongly accords with the Core Planning Principles set out in the National Planning Policy Framework (referred to as 'The Framework' from here on). Specifically, the importance of focussing housing and employment development in locations accessible to the main centres with economic growth potential. This both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger settlements in the district offer the greatest potential to achieve this, due to their greater size and the economies of scale that this offers in terms of offering employment and services in the same settlements. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

Whilst Option 2 (New Community) may seem attractive to some, largely as it would divert development away from other towns, the impact of a new settlement would be significant. A new community would require a major investment in new infrastructure, facilities and core services and this would impact on the future investment in existing towns and villages. This would have a negative effect as the benefits of growth would not be realised within the existing settlements.

No doubt other new communities in the south west, such as Sherford and Cranbrook, have triggered the identification of such an option for Mid Devon. However, Sherford and Cranbrook are both closely related to the strategic economic scale and growth potential of Plymouth and Exeter respectively, building on that economic base. This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion City. The situation is very different in a rural area like Mid Devon. It is also important to consider the experience in terms of delivery of Cranbrook and Sherford. These new communities have had significant lead in times, taking in excess of 15 years from first being considered to planning permission being granted, let alone construction. With a plan period looking ahead to 2033, the main focus for employment development must therefore continue to be in the three main towns of Cullompton, Tiverton and Crediton (S3 Option1).

## **Cullompton**

The S3 Option 1 scenario identifies a need for 46,700 sq metres of commercial floorspace in Cullompton between 1st April 2013 and 31st March 2033. This figure translates into an annual rate of 2,335 gross sq metres of floorspace, as set out in Policy S12. We strongly support the provision of this level of floorspace within the existing town of Cullompton. Employment needs can be met in a sustainable manner within the town and as such there is no need for a new community to achieve this.

### **Additional Cullompton Employment Sites – Policy CU13**

We strongly support the inclusion of option A – Venn Farm. The site in question was previously allocated for employment development in the adopted 2006 Local Plan. The site was also assessed as an option for employment during the pre-adoption stages of the Site Allocations & Infrastructure DPD (SAIDPD). The sole reason the site was not allocated in the previous *Site Allocations & Infrastructure DPD* was the alleged absence of need for an additional employment site in the town. This conclusion was reached based on the assumption that the other employment allocations in the DPD would be delivered. Up take has been slow and we expect this to continue to be the case.

Venn Farm is a logical extension to the existing industrial estate, and there are no constraints to prevent the site from being delivered.

The allocation of the site would provide the opportunity for a visual enhancement to the wider industrial estate and would secure both immediate local road improvements and wider benefits. The proposals would not give rise to adverse flood risk or ecological impacts.

The Council's recent Employment Land Review recommends that employment land focus around the existing concentration of employment land at the Kings Mill Industrial Estate as there is potential for development or redevelopment of land within the existing Estate. The allocation of Venn Farm would help realise this desire.

Venn Farm performs well when assessed against the other employment options. This is clearly demonstrated by the paperwork which supports the current planning application for 15,236sq m of employment space (B1, B2 and B8 use) at Venn Farm. The LPA planning application reference is 09/01573/MOUT and we request that this be considered as part of the Local Plan Review process. The land in question is controlled by our client, Price Waterhouse Cooper, although historically it was owned by ROK Development Ltd who had acquired Venn Farm in good faith in 2007 on the basis of the allocation for employment in the 2006 Local Plan. When ROK went into liquidation Price Waterhouse Cooper became responsible for the site. As well as the planning merits of the site, its allocation for employment through Policy CU13 (A) would have significant positive benefits for a large number of creditors.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind Regards



Alex Graves BA (Hons) PG Dip MRTPI  
**For PCL Planning Ltd**  
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